

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554



March 29, 2011

Regina McNeil
Vice President and General Counsel
National Exchange Carrier Association
80 South Jefferson Road
Whippany, NJ 07981

RE: CC Docket No. 01-92; GN Docket No. 09-51; WC Docket Nos. 05-337,
07-135, 10-90: Data Related to Universal Service and Intercarrier
Compensation Reform

Dear Ms. McNeil:

We write to formally request that the National Exchange Carrier Association (NECA) provide the Federal Communications Commission certain basic data related to universal service and intercarrier compensation. NECA, created by the Commission as the national administrator of pooled interstate exchange carrier revenues, is uniquely situated to provide the Commission with key data to evaluate proposed universal service and intercarrier compensation reforms.¹

We note that Commission staff has engaged with NECA staff on data issues for the past six months. In December 2010, NECA submitted to the Commission a survey questionnaire NECA sent to its members and certain state-level data derived from the survey. We appreciate NECA's engagement, but the data submitted to date are insufficient for our purposes.

As discussed during our phone conversation last week, we request six categories of data, detailed below, and ask that NECA provide the data to the Commission, in the level of granularity and specificity requested, no later than April 6, 2011. For any data

¹ See Amendment and Clarification of Part 69 Rules Governing the National Exchange Carrier Association, CC Docket No. 87-2, Memorandum Opinion and Order and Notice of Proposed Rule Making, 2 FCC Rcd 381, 382, para. 8 (1987) ("NECA's unique perspective, information, and expertise should be available to this Commission in making determinations that have broad and far-reaching effects upon exchange carriers, ratepayers, and the provision of telecommunications services.").

that NECA is unable provide to the Commission by April 6, we ask that NECA explain with specificity why it is not able to provide such data at that time and indicate when the data will be provided.

The information we seek includes data elements that NECA must collect and use in the ordinary course of performing its core functions of administering pooled interstate exchange carrier revenues and preparing tariffs. We presume that NECA has complete and accurate data necessary to perform its core functions, and we expect that providing such data at the level of specificity and disaggregation requested should not be unduly burdensome, as NECA must work with this data in a disaggregated manner to administer pooled revenues and to prepare tariffs.

We seek the following data elements:

1. Interstate switched access revenues, expenses, and minutes of use, reported annually for the period from 2008 to 2010 and broken out by carrier, by study area, by rate element, and by originating and terminating access.
2. Stratification of residential line counts by monthly local retail rate for year end 2010, by carrier, for the strata in the table below (exclusive of subscriber line charge):

R1 Rate	Line Count
\$8.99 and below	
\$9.00 - \$10.99	
\$11.00 - \$12.99	
\$13.00 - \$14.99	
\$15.00 - \$16.99	
\$17.00 - \$18.99	
\$19.00 and above	

We also seek data that NECA collects through member surveys and in the process of preparing any intrastate tariffs or related intrastate work NECA elects to perform for its members. Specifically, we seek the following:

3. Intrastate switched access revenues, expenses, and minutes of use, reported annually for the period from 2008 to 2010 and broken out by carrier, by study area, by rate element, and by originating and terminating access.
4. Reciprocal compensation revenues, expenses, and minutes of use, reported annually for the period from 2008 to 2010 and broken out by carrier by study area and by rate element.
5. Additional carrier-specific annual data from 2008 to 2010 detailing:
 - local revenue

- federal USF revenue
- state USF revenue
- interstate special access revenue
- intrastate special access revenue
- NECA settlement revenue
- other regulated revenue
- total regulated revenue
- video revenue
- Internet revenue (retail broadband)
- long distance revenue
- other non-regulated revenue
- total non-regulated revenue
- year end penetration rates for video, Internet, and long-distance services

6. Data on long-term debt by carrier, broken out by lender, detailing:

- original amount
- original term
- interest rate
- remaining balance
- remaining term
- annual interest
- principal payments

For this type of data, we expect that NECA will work expeditiously to identify data it has collected or otherwise possesses, and to provide such data to us in an expedited manner wherever possible. As NECA continues to collect voluntary data, we encourage it to disclose to companies providing data that the Commission may obtain this data.

We understand that some of your members may consider this information to be proprietary. We remind you and your members that the Commission has a protective order in place in this proceeding to protect those reasonable interests.² We also remind you that:

“The Commission shall at all times have access to and the right of inspection and examination of all accounts, records, and memoranda, including all documents, papers, and correspondence now or hereafter existing, and kept or required to be kept by such carriers...”³

² See *Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92, Protective Order, 25 FCC Rcd 13160 (WCB 2010).

³ 47 U.S.C. § 220(c).

Thank you in advance for your cooperation. Commission staff is available to assist NECA as necessary to ensure the complete and timely submission of the requested data.

Sincerely,

Sharon E. Gillett
Chief, Wireline Competition Bureau
Federal Communications Commission